

1 WENDY MEDURA KRINCEK, ESQ., Bar # 6417
2 Z. KATHRYN BRANSON, ESQ., Bar # 11540
3 LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937
4 Telephone: 702.862.8800
Fax No.: 702.862.8811
5 Email: wkrincek@littler.com
Email: kbranson@littler.com

6 Attorneys for Defendant
7 US ONCOLOGY CORPORATE, INC. dba COMPREHENSIVE
8 CANCER CENTERS OF NEVADA

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 VANESSA THOMAS,

13 Plaintiff,

14 vs.

15 US ONCOLOGY CORPORATE, INC. dba
16 COMPREHENSIVE CANCER CENTERS
OF NEVADA; DOES 1-50 and ROES 1-
50,

17 Defendant.
18

Case No. 2:19-cv-00958-RFB-CWH

STIPULATION FOR EXTENSION OF TIME
FOR DEFENDANT TO FILE RESPONSIVE
PLEADING

(FIRST REQUEST)

19 Pursuant to LR 6-1 and LR II 7-1, Plaintiff, VANESSA THOMAS and Defendant US
20 ONCOLOGY CORPORATE, INC. dba COMPREHENSIVE CANCER CENTERS OF NEVADA,
21 by and through their respective attorneys of record, hereby stipulate and agree that Defendant has
22 thirty (30) days to file its responsive pleading to Plaintiff's Complaint (ECF No. 1), which Complaint
23 was filed on June 5, 2019 and served on June 7, 2019. The parties make this request due to Defendant's
24 counsel's recent retention and need for additional time to investigate the allegations in the Complaint
25 in order to respond.

26 If the requested extension is granted, Defendant will file its response to Plaintiff's Complaint
27 on **July 29, 2019**.
28

1 This is the first request for an extension of time to file a responsive pleading made by the
2 parties and the parties make this request in good faith and not for the purpose of delay.

3 IT IS SO STIPULATED.

4 Dated: June 28, 2019

Dated: June 28, 2019

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Eran S. Forster

8 DANIEL R. WATKINS, ESQ.
9 ERAN S. FORSTER, ESQ.
WATKINS & LETOFSKY, LLP

/s/ Z. Kathryn Branson

WENDY M. KRINCEK, ESQ.
Z. KATHRYN BRANSON, ESQ.
LITTLER MENDELSON, P.C.

10 Attorney for Plaintiff
11 VANESSA THOMAS

Attorneys for Defendant
US ONCOLOGY COPORATE, INC. dba
COMPREHENSIVE CANCER CENTERS OF
12 NEVADA

13
14 **IT IS SO ORDERED.**

15 Dated this 3 day of July, 2019.

16
17 
18 UNITED STATES DISTRICT COURT JUDGE

19
20
21
22
23
24
25
26
27
28
FIRMWIDE:165206460.1 037360.1325